UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
v.	:	**Case No. 1:24-mj-380**
DANIEL DUSTIN DENEUI	:	
Defendant.	:	

REPLY TO OPPOSITION TO MOTION FOR PERMISSION TO TRAVEL TO PRESIDENTIAL INAUGURATION

COMES NOW the defendant, Daniel Dustin Deneui, by and through counsel, Jeffrey Zimmerman, in reply to the *United States Opposition to Defendant's Motion to Modify Conditions of Release*, ECF 12 (D.D.C. 1/16/25).

At defendant's initial appearance on January 16, 2025, the government — when asked directly by the Court for its position on Mr. Deneui's request to travel to the inauguration — stated that it would "defer to the Court." After yesterday's hearing, Chambers indicated to all counsel that Mr. Deneui's motion would be granted. The government subsequently filed its opposition.

Nothing has changed. The government cited three cases in which a defendant's motion to travel to the inauguration has been denied. *See* ECF 12 at 4 (citing *United States v. Belliveau*, No. 24-cr-327 (D.D.C); *United States v. Taylor*, No. 21-cr-392 (D.D.C); and *United States v. Belliveau*, No. 24-cr-291 (D.D.C)). Defendant has previously distinguished the *Taylor* and *Tatum* cases. *See* ECF 11 at 2. In *Belliveau*, Judge Kelly denied an inauguration travel request where the defendant was accused of inflicting bodily injury and using chemical spray against a law enforcement officer. *See Minute Order, United States v. Belliveau*, No. 24-cr-327-TJK (D.D.C. Jan. 2, 2025). Mr. Deneui is not facing allegations that rise to this level.

Mr. Deneui is presumed innocent of all charges. He has been released on his own recognizance, subject to Pretrial Services Supervision. The Pretrial Services Report for this Court states that his "Risk Level" is "Low." Mr. Deneui has no prior convictions and no history of supervision noncompliance. He has been in full compliance with conditions in DC and in his home jurisdiction of the Northern District of Texas (Fort Worth). He has been doing everything required of him since his arrest and fully intends to continue to do so.

Respectfully Submitted,

DANIEL DUSTIN DENEUI
By Counsel

___/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of January 2025, a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record.

_____/s/_____
JEFFREY D. ZIMMERMAN